

Christopher O. Smith

Name

P.O. Box 208

Indian Springs, NV 89070

#1105576

Prison Number

DISTRICT COURT
CLARK COUNTY, NEVADA

Christopher O. Smith

Plaintiff,

vs.

William Hutchings

Monique Pickett

James Scally - etc.

Defendant(s).

CASE NO. _____
(To be supplied by the Clerk)

CIVIL RIGHTS COMPLAINT
PURSUANT TO
42 U.S.C. § 1983

A. JURISDICTION

1) This complaint alleges that the civil rights of Plaintiff, Christopher O. Smith,
(Print Plaintiff's name)

who presently resides at Southern Desert Correctional Center, were

violated by the actions of the below named individuals which were directed against

Plaintiff at SDCC / Indian Springs on the following dates
(institution/city where violation occurred)

8th Amendment

(Count I)

(Count II)

(Count III)

Make a copy of this page to provide the below
information if you are naming more than five (5) defendants

2) Defendant William Hitchens resides at SDCC/NDCC
(full name of first defendant) (address if first defendant)
and is employed as Warden of SDCC. This defendant is sued in his/her
(defendant's position and title, if any)
☒ individual ☒ official capacity. (Check one or both). Explain how this defendant was
acting

under color of law: At all times he was a agent at the State of
Nevada as a Warden

3) Defendant Monique Pickett resides at SDCC/NDCC
(full name of first defendant) (address if first defendant)
and is employed as Warden of SDCC. This defendant is sued in his/her
(defendant's position and title, if any)
☒ individual ☒ official capacity. (Check one or both). Explain how this defendant was
acting

under color of law: At all time she was a agent of the State of
Nevada as a Warden

4) Defendant James Scally resides at SDCC/NDCC
(full name of first defendant) (address if first defendant)
and is employed as Warden of SDCC. This defendant is sued in his/her
(defendant's position and title, if any)
____ individual ____ official capacity. (Check one or both). Explain how this defendant was
acting

under color of law: At all times he was a agent of the State
of Nevada as a Warden

5) Defendant _____ resides at _____
(full name of first defendant) (address if first defendant)
and is employed as _____. This defendant is sued in his/her
(defendant's position and title, if any)
____ individual ____ official capacity. (Check one or both). Explain how this defendant was
acting

under color of law: _____

6) Defendant _____ resides at _____,
(full name of first defendant) (address if first defendant)
and is employed as _____. This defendant is sued in his/her
(defendant's position and title, if any)
____ individual ____ official capacity. (Check one or both). Explain how this defendant was
acting
under color of law: _____

7) Jurisdiction is invoked pursuant to 28 U.S.C. § 1343 (a)(3) and 42 U.S.C. § 1983. If you wish to assert jurisdiction under different or additional statutes, list them below.

28 U.S.C. § 1331, 2381, Eighth Amendment of the U.S. Const.
and Nevada Const. NRS Rule 25 Fed R. Civil P. whereas substitute of Party ~~Chavarran~~
Rule 15 Fed R. Civ. P

B. NATURE OF THE CASE

1) Briefly state the background of your case.

This is a Civil Rights action brought pursuant to 42 U.S.C. § 1983 against the Defendants herein in their official and individual capacity for violation of Plaintiff's Eighth Amendment rights/Deliberate Indifference to the United States Constitution.

Plaintiff seek Monetary damages, injunctive Relief and Demand a Trial by Jury.

C. CAUSE OF ACTION

COUNT I

The following civil rights has been violated: 8th Amendment of U.S. Const.
Protection Deliberate Indifference, Conspiracy to act with Deliberate
Indifference, Denial of basic human needs of Confinement, Article 1 Sec. 6 of Nevada Const.
Crack and unusual Punishment

Supporting Facts: [Include all fact you consider important. State the facts clearly, in your own words, and without citing legal authority or argument. Be sure you describe exactly what each specific defendant (by name) did to violate your rights].

Plaintiff, adapts all memorandum of Points: Authorities: legal Arguments in this Civil Rights Complaint pursuant to 42 U.S.C. § 1983 as fully restated herein. Defendants/Respondents Scally, Pickett and Warden William ~~Huckington~~ ~~Huff~~ all violated the 8th Amendment Deliberate Indifference & Conspiracy to act with Deliberate indifference by (1) refusing to create CDC mandates: Recommendation of Social distancing while being aware of the Corona-Virus Global Pandemic, forcing plaintiff to be exposed or worse infected as I was on 12.15.20 with this most contagious deadly virus on the planet as we speak. (Corona-Virus) Also known as (Covid-19) which if infected could cause plaintiff to suffer by becoming very ill have long term side effects or "Death". which I've experience being very ill can't breath, or Sleep, Migraine headache and almost close to death (2) S.D.C.C. refusing to house plaintiff in a safe "Social distancing" environment protecting him from the risk of deadly harm as plaintiff is at the highest risk due to "pre existing Conditions" (see EXIB) During this Corona-virus Global Pandemic NDOC, S.D.C.C. housing plaintiff along with other inmates at S.D.C.C. in a unsafe unconstitutional open Dormitory, under cramped conditions with only a few ~~feet~~ 2 1/2 to be exact away from one another. Which is a perfect setting for Covid-19 outbreak

(3) The above Defendants acted with Deliberate indifference by knowing the seriousness of the coronavirus at S.D.C.C. Administrators acknowledge that current measures are inadequate to stop the spread of COVID-19. Primitive structures, older ventilation systems, crowding, and dormitory-style housing make it difficult to control the spread of the virus (4) Defendants/Respondents William Hutchings, Warden of SDCC; Monique Pickett Warden of SDCC; James Scally, Warden of SDCC John/Tame Doe's 1-100 all violated the 8th Amendment - Deliberate Indifference by not providing adequate Mask & no hand sanitizer from 1/10/20 - to present while Plaintiff has been housed in Unit 2B "Dormitory" at S.D.C.C., during the Corona-virus Global Pandemic. They failed to issue Plaintiff hand sanitizer & Mask during that time period, in this Dorm of 120 inmates all touching the same things phones/water fountains/bathroom toilets, Kiosk & Sinks. Adequate hand sanitizer & Mask were mandated items to be distributed to S.D.C.C. Prisoners to protect them from contracting this deadly virus that's very contagious and can cause Plaintiff serious harm due to fact he is in the high risk factor because of Pre-existing Conditions (see Ex. C) Plaintiff health & life would be at risk of being infected with COVID-19 if he is not issued a Mask (N95) & hand sanitizer. They did not issue adequate Mask or Hand sanitizer which contributed to Plaintiff contracting Coronavirus on or around about 12-1-20 & being hampered with the symptoms listed above which is the nature of case also with after effects which is diagnose as "Long-COVID Syndrome" which is indefinitely. He also suffers from Mental, Physical & "Emotional" distress. Defendants/Respondents William Hutchings, Warden of SDCC; Monique Pickett, Warden of SDCC; James Scally, Warden of SDCC John/Tame Doe's 1-100 all violated the 8th Amendment - Cruel & Usual Punishment, Conditions of Confinement, Basic Human Needs, Deliberate Indifference by refusing to have "HOT" water in SDCC Kitchen so inmates can properly wash hands & food trays. There has been laws in place for decades in Indian Springs Nevada & Clark County Nevada, that "NO" Kitchen can legally operate without Hot running water for workers to wash hands & eating utensils, plates, trays, this is because workers wouldn't be able to properly wash hands & Sanitize trays this could expose inmates to unreasonable risk/harm of infection/Coronavirus from it being passed from the hands & trays & causing them to be infected. Which is exactly what happened to Plaintiff. The admitted lack of HOT Water in SDCC Kitchen contributed to plaintiff contracting Coronavirus/Covid-19 on or about 12-15-20. Defendant refused to fix the Hot water in the Kitchen to operate in accordance with health & safety protocols that have existed for decades, in order to expose Plaintiff to Covid-19. Defendants/Respondents William Hutchings, Warden of SDCC; Monique Pickett, Warden of SDCC; James Scally, Warden of SDCC John/Tame Doe's 1-100 all violated the 8th Amendment - Deliberate Indifference & Conspiracy to act with deliberate Indifference, by the following statement of facts

- 1) Defendants knew that Coronavirus was a serious matter since 1/23/20 because it became significant in China & Europe.
- 2) Defendants knew Coronavirus had become a Global Pandemic by 3/1/20. Proof of this fact is that SDCC stopped all contact & behind the glass visitation due to Covid-19.
- 3) On around August of 2020 the CDC issued the following Covid 19 Pre-cautionary measures to reasonably protect U.S. citizens from Covid-19 (A) wash hands in HOT WATER (B) Hand Sanitizer (C) reduce occupancy of indoor facilities/buildings/churches to 25% in order to (D) Create 6-foot Social Distancing & (E) Quarantine for 14 days those who either exposed to Covid-19 or either tested positive for Covid-19. These were guidelines that were adopted by Nevada, by Governor Steve Sisolak in the form of "State Directives".
F) Adequate Mask
- 4) These Defendants from 1/20/20 - to present never issued any of the Above Pre-Cautionary Measures to reasonably protect SDCC inmates from contracting "Covid-19". (5) Defendants did not allow unit RB inmates cleaning supplies to sanitize the unit & only allow the unit porters to clean the unit once a day. They allowed unit 12 B to clean & "Sanitize" the whole unit 12B on one day (12/23/20) (6) Defendants knew there was an outbreak among SDCC culinary staff & kitchen inmate workers on around 11/15/20 (Coronavirus Outbreak). There was NO "HOT WATER" for inmates to properly wash & sanitize hands & trays; thus caused SDCC to be lockdown unit 4 (Workers unit). 7) Inmates working with or around inmates who've tested positive for Covid-19 in the kitchen around 11/15/20, were allowed to remain in the kitchen as kitchen workers

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4 i remain in the dorms even though they were exposed to or positive
5 for Covid-19. They were allowed to remain and Plaintiff in unit 12B
6 8) Though Scally, Pickett & other SDCC staff came to unit 12B
7 on around 11/12/20 to address SDCC lockdown's Coronavirus
8 concerns, stating in part that "Hutchings, Scally & Pickett have
9 had many meetings on the response of Covid-19 at SDCC since
10 March of 2020. That they don't know what to do. They don't
11 know how to slow down the spread of Covid-19 at SDCC." That
12 unit 12B is one of the early units at SDCC, where no has tested
13 positive for Covid-19. You guy's must have good water - you guy's must
14 be blessed because if one person in unit 12B becomes infected
15 with Covid-19 it will rapidly spread throughout the "whole unit 12B"
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because of how the building is designed with "no Physical Separation
 These Defendants knew that Covid-19 outbreak was only a matter of
 time in Unit 12B, due to the fact that unit Kitchen Workers in 12B had
 already been exposed to other inmates (Kitchen workers from unit 4) as well
 as SDCC Staff in the Kitchen who had already been exposed or tested
 positive for Covid-19, posing a serious risk, threat and harm to Petitioner
 due to the existing "Pre-Existing Condition" as well as other inmates in unit 12B.
 Despite all the above on or around 12-4-20 Pickett, Scally, Hutchings
 came back to unit 12B & Pressured inmates to work in the Kitchen knowing
 there had already been a deadly outbreak of Coronavirus in SDCC Kitchen with
 other inmates & staff members & even went to the extent of threatening them (12B
 inmates) stating that "If they don't agree to work in a Covid-19 infested Kitchen,
 because unit 4 workers were exposed & sick from Covid-19 resulting in unit 4
 as a whole going on lock down, that will enforce social distancing on the phones
 & allow only 2 people out of 120 people to use the phones at a time (instead of 4)
 which would have caused a serious "race riot". This was the blatant threat/
 retaliation to the health & safety & life of Petitioner, there wasn't 1 time that I
 didn't feel like they were trying to "kill me" literally and other 12B inmates.
 But considering the less of the two evils about 30 inmates from 12B agreed
 to work inside the kitchen at SDCC after being pressured into doing so.
 Unit 12B inmates started working around 12-5-20 and around 12-6-20 "All
 the kitchen workers came back to unit 12B sick with Coronavirus" (Covid-19).
 1) By 12-8-20 Plaintiff & nearly 92% of unit 12B inmates all became
 severely ill with Covid-19. Many inmates died & got hospitalized. So Defendants
 was dead on with their prediction, there was a rapid spread of
 Covid-19 once one person caught in 12B.

Plaintiff had Covid-19 symptoms, high fever, chills, severe shortness of breath I couldn't barely make it to the toilet, fatigue, muscle/body aches, headaches, loss of taste, running nose, vomiting, diarrhea etc. Plaintiff sustains these symptoms from 12.8.20 - 1.15.21. After 1.15.21 Plaintiff continued to experience the following after effects, till the present day. Cloudiness of mind, Memory loss, Drowsiness, Fatigue, back pain, Shortness of breath, low energy etc. which ~~was~~ ^{I was told} and is known as "long Covid Effect". And during 12.8.20 - 1.15.21 Plaintiff receive "NO Medical Attention" they left Plaintiff in that Dormitory with a 120 other inmates which almost all were severely ill and gave Plaintiff and other severely sick inmates "NO Medical Treatment" see Plaintiff Informal grievance (Ex 2) Plaintiff is part of the "CDC Mute ~~Class~~ ^{Vulnerable} Class". Plaintiff found out he had Covid-19 on 12.15.20 and was almost to the brink of death because of severe illness with NO Medical treatment and they didn't move Plaintiff with the rest of the severely sick inmates and left us in the Dormitory for over 10 plus days. and after 10 to about 15 days call there self making inmates who only showed a persisting sign of illness. The damage was already done. People died due to SDCC Medical neglect by not properly treating inmates with Corona-virus. Plaintiff contends that the above named Defendants violated the 8th Amendment by having clear knowledge Global Pandemic. The fact that staff & inmates at SDCC were increasingly becoming infected with Corona-virus, primarily from the kitchen, They knew there were Mandatory Covid-19 Precautionary Measures that were suppose to be implemented at SDCC, but especially in the Dorms, but they did not put any Measures in place. They were suppose to, after having/Harboring knowledge of Plaintiff's serious risk of contracting Corona-virus and was required by law, to take reasonable Measures to minimize the risk. By Isolating Transferring, or releasing Plaintiff by failing to do this Defendants dramatically increased

his risk of contracting Covid-19, that constitutes Deliberate Indifference.
 Deliberate indifference may appear when prison officials deny, delay or
 intentionally interfere with Medical treatment, or it may be shown by the way
 in which Prison Physicians provide Medical care. In Plaintiff's case they
 provided NO Medical help or treatment knowing before hand that Plaintiff
 contracted Covid-19 on or before 12-15-20. On or about 12-21-20 Medical
 Staff came to 12B and said write a medical kite to find out your Covid-19
 test result during that time Plaintiff and 92% of unit 12B was severely sick.
 I Ask for help at that time and receive none from Medical Staff I was only
 told "put in medical kite for cold setup" are you kidding me I could have
 been dead by then. Defendants act with Deliberate indifference and Conspiracy
 to act with deliberate indifference. This is base upon the above because
 Defendants respond with reckless disregard for Plaintiff's life, health, safety
 which ultimately lead to Plaintiff being infected with Coronavirus & Sustain
 Physical, Mental & Emotional injury.⁽¹⁰⁾ Every inmate in unit 12B was tested
 for Covid-19 on or about 6th or 8th of Dec. of 2020 when SDCC Medical
 Staff came to the unit (12B) on or about 12-21-20 the whole unit was asking
 for Cold Setups because they were sick. The Medical Staff had prior
 knowledge to positive Covid test results beforehand. A Prison official may be
 held liable under 8th Amendment for acting with "deliberate indifference"
 to inmate health & safety only if he knows that inmates face a substantial risk
 of serious harm and disregards that risk by failing to take reasonable measures
 to abate it. Defendants knew the serious harm of this Global Pandemic
 Covid-19 when unit 4 workers and unit 4 as a whole was put on lockdown for
 Covid-19 outbreak in the kitchen between staff, inmates and Warden Hutchins,
 Pickett & Scally force inmates from 12B with threats to go work in a Covid
 infested kitchen/environment and shortly after inmates from 12B caught
 Covid and infected the whole Dormitory unit (12B).⁽¹¹⁾

So inmates became frustrated due to not knowing their test results,
 not getting proper Medical treatment submitting kites for their results
 but getting no response. So this sparked a "Protest" where unit 12B
 inmates refused to lock down until Warden Hutchings came & let us
 know our test results, cleaning supplies to clean the unit & give us fresh
 air for once, to relief of a stuffy unit with bad ventilation, ^{and} ~~and~~
 a unit full of sick people that were all positive from Covid-outbreak that shut
 down the whole Prison. And this would have caused a riot between inmates
 & staff but people / inmates were desperate because the alternative was
 "DEATH"! Unit 12B inmates were trying to have Covid-19 guide lines to be
 implemented to save and protect human lives & to protect their long-term
 health. Plaintiff was in a "triage" environment with "NO MEDICAL HELP"
 watching people suffer to death, beg for help Medical treatment
 and were denied and even some die in Unit 12 at SDCC.
 This Protest caused Scally to come down to unit 12B on 12-22-20 at
 around 4:45 pm, along with other staff members and asked "what can
 we do not only to keep the peace, but also help you guys assist us to
 stop another outbreak during Covid-19 Global Pandemic?"
 Plaintiff along with other inmates demanded (1) Cleaning supplies so inmates
 can properly clean & sanitize the unit. (2) To fix the "HOT WATER" in the
 kitchen (3) To create 6-foot "Social Distancing" conditions so we can
 protect ourselves against another Covid-19 outbreak. (4) to use proper (N95)
 mask to protect us from Covid-19 (5) To allow us to go outside to get fresh
 air while cleaning the unit (6) We demand our test results (Plaintiff came back
 positive on 12-24-20) (7) That it would violate Federal Law to make
 unit 12B a Quarantine unit. (8) The inmates who tested positive for Covid-19
 be Quarantine & (9) To release / Transfer 50% of the prison population in
 order to create proper 6 ft Social distancing.

1 Scally responded with (1) "Me releasing you guys is like hitting
 2 the lottery, you know that's not going to happen" (2) I disagree
 3 with this unit RB being a Quarantine unit, though he admitted on
 4 12/23/20 that he made unit RB a Quarantine unit (3) That he
 5 ordered Medical Staff "not to give us our Covid-19 test results
 6 unit RB on 12-15-20. Though Scally agreed to have Medical Staff
 7 issue our test results later. But this whole time Scally: SDCC
 8 Medical Staff knew all along that inmates in RB already tested
 9 positive for Covid-19. Scally SDCC Medical Staff "conspired" to cover-up
 10 this fact because they did not respond reasonably to inmates Covid-19 risk
 11 by treating inmates medically, by quarantining positive inmates, by trans-
 12 forming / releasing 50% of the prison population in order to create proper
 13 social distancing conditions nor did they wanted to implement pre-cautionary
 14 measures in the form of state directives in order to adequately
 15 protect inmates from Covid-19 at SDCC. Scally agreed to order
 16 Medical Staff to respond to Plaintiff's Medical Kites requesting test
 17 results, to issue cleaning supplies. But he stated "He will not create 6-foot
 18 social distancing conditions at SDCC in unit RB: want issue us "N95
 19 Mask because we already have Cloth mask". Scally i and other staff stated
 20 "they had a lot of inmates who were positive for Covid-19" but refuse to inform
 21 them, treat them and quarantine them, showing intentional / deliberate
 22 "cover up". Plaintiff's medical kite was returned i Plaintiff results for
 23 Covid-19 was Positive !! 92% of all kites returned to inmates in unit RB
 24 were positive but Defendants already knew that. But for some odd reasons
 25 didn't want Plaintiff: other inmates to know, Defendants refuse to implement
 26 pre-cautionary measures to prevent the spread of Covid-19 SDCC i and
 27 there medical staff knew that Plaintiff was at "High Risk" due to pre-existing
 28 Condition (see Ex^(D)) but instead chose to be silent i cover up their mishap

with Plaintiff life!! Defendants didn't apply the state directives of releasing 50% of it's Prison Population they were deliberate indifference to Plaintiff's Covid-19 risk without question. Which caused him to contract Covid-19, to suffer serious harm; after effects; refuse to treat him or even care and talk with or examine him.

Defendants choose to create the problems listed above. Plaintiff contends that all above named Defendants conspired to infected Plaintiff; unit 12B inmates at SDCC. They conspired to put sick inmates back in unit 12B who were either exposed or infected with Covid-19. They conspired not to implement Covid-19 Protocol; Pre-cautionary Measures issues by CDC; adopted by Nevada Governor Sisolak as state directives to be implemented as safety; Pre-cautionary Measures in order to protect human lives. They conspired to not tell Plaintiff; other inmates at SDCC that they tested Positive. Scally made the call and all the other defendants followed suit. This is definitely an 8th Amend. Violation on SDCC Administration; Medical Staff as a whole. They violated all Medical Procedures; Policies; wouldn't treat inmates with or for Covid-19 because they didn't want Prisoners to know they've contracted Coronavirus / Covid-19. This is for sure Criminal Behavior, Plaintiff sustained Physical / Mental / Emotional injury. (11) Defendants all violated 8th Amendment by acting with deliberate indifference; conspiracy to act with deliberate indifference because they've known that since 12-15-20 Plaintiff was exposed to and contracted Covid-19. Inmates in unit 12B who were exposed or tested positive for Covid-19 SDCC Medical Staff refuse to Quarantine them (kitchen workers) which caused Plaintiff to contract Covid-19. Defendants refused to do the right thing. They showed reckless disregard for Plaintiff's health; safety left Plaintiff in the unit with Covid-19 and being severely ill and gave him "NO Medical AID" And since 12-15-20 until the present new strains are popping up like BA.2.

COUNT II

The following civil rights has been violated: N/A

Supporting Facts: [Include all fact you consider important. State the facts clearly, in your own words, and without citing legal authority or argument. Be sure you describe exactly what each specific defendant (by name) did to violate your rights].

N/A

COUNT III

The following civil rights has been violated: N/A

Supporting Facts: [Include all fact you consider important. State the facts clearly, in your own words, and without citing legal authority or argument. Be sure you describe exactly what each specific defendant (by name) did to violate your rights].

N/A

D. PREVIOUS LAWSUITS AND ADMINISTRATIVE RELIEF

- 1) Have you filed other actions in state or federal courts involving the **same or similar facts** as involved in this action? ☐ Yes ☐ No. If your answer is "Yes", describe each lawsuit. (If more than one, describe the others on an additional page following the below

outline).

- a) Defendants: N/A
- b) Name of court and docket number: N/A
- c) Disposition (for example, was the case dismissed, appealed or is it still pending?):

- d) Issues raised: N/A

- e) Approximate date it was filed: N/A
- f) Approximate date of disposition: N/A

- 2) Have you filed an action in federal court that was dismissed because it was determined to be frivolous, malicious, or failed to state a claim upon which relief could be granted?
 ____ Yes ☒ No. If your answer is "Yes", describe each lawsuit. (If you had more than three actions dismissed based on the above reasons, describe the others on an additional page following the below outline.)

Lawsuit #1 dismissed as frivolous, malicious, or failed to state a claim:

- a) Defendants: N/A
- b) Name of court and case number: N/A
- c) The case was dismissed because it was found to be (check one): N/A frivolous
 ____ malicious or ____ failed to state a claim upon which relief could be granted.
- d) Issues raised: N/A

- e) Approximate date it was filed: N/A
- f) Approximate date of disposition: N/A

Lawsuit #2 dismissed as frivolous, malicious, or failed to state a claim:

- a) Defendants: N/A
- b) Name of court and case number: N/A

- c) The case was dismissed because it was found to be (check one): N/A frivolous
 ____ malicious or ____ failed to state a claim upon which relief could be granted.
- d) Issues raised: N/A
- e) Approximate date it was filed: N/A
- f) Approximate date of disposition: N/A

Lawsuit #3 dismissed as frivolous, malicious, or failed to state a claim:

- a) Defendants: N/A
- b) Name of court and case number: N/A
- c) The case was dismissed because it was found to be (check one): N/A frivolous
 ____ malicious or ____ failed to state a claim upon which relief could be granted.
- d) Issues raised: N/A
- e) Approximate date it was filed: N/A
- f) Approximate date of disposition: N/A

- 3) Have you attempted to resolve the dispute stated in this action by seeking relief from the proper administrative officials, e.g., have you exhausted available administrative grievance procedures? X Yes ____ No. If your answer is "No", did you not attempt administrative relief because the dispute involved the validity of a: (1) ____ disciplinary hearing; (2) ____ state or federal court decision; (3) ____ state or federal law or regulation; (4) ____ parole board decision; or (5) ____ other ____.
- If your answer is "Yes", provide the following information. Grievance Number ____.
- Date and institution where grievance was filed ____.

Response to grievance: Informal Grievance: Denied / 1st level Grievance
2nd / 3rd level Grievance:

E. REQUEST FOR RELIEF

I believe that I am entitled to the following relief:

Full coverage for Medical for my Brain/Eyes/Dental/Heart/Lungs/Liver/Kidneys
for the duration on my Natural life because Mosaic Et. Al Deliberate Indifference willful
intent, wanton malice; blatant disregard for my Federal Constitutional Rights to the 14th & 8th
Amend. Monetary damages for Mental, Emotional & Physical injury; anguish due to
Irreparable damage to my future health from Contracting Covid-19 in Mosaic/SDCC for
operating SDCC culinary with NO Hot water/Sanitation; for not providing fresh MILK --- Financial
Compensation of \$10 million U.S. Dollars. Suffering; Pain that will forever persist from this.

I understand that a false statement or answer to any question in this complaint will subject me to penalties of perjury. **I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.** See 28 U.S.C. § 1746 and 18 U.S.C. § 1621.

N/A

(Name of Person who prepared or helped
prepare this complaint if not Plaintiff)

Chris Smith

(Signature of Plaintiff)

5/10/22

(Date)

(Additional space if needed; identify what is being continued)

CERTIFICATE OF SERVICE BY MAILING

I, Chris O. Smith, hereby certify, pursuant to NRCP 5(b), that on this 10th
day of May, 2022, I mailed a true and correct copy of the foregoing, "1983 Civil
Rights Lawsuit"

by placing document in a sealed pre-postage paid envelope and deposited said envelope in the
United State Mail addressed to the following:

N/A

CC:FILE

DATED: this 10 day of May, 2022

Chris Smith

1105576

/In Propria Personam

Post Office Box 208, S.D.C.C.
Indian Springs, Nevada 89018
IN FORMA PAUPERIS:

AFFIRMATION
Pursuant to NRS 239B.030

The undersigned does hereby affirm that the preceding _____

1983 Civil Rights Lawsuit
(Title of Document)

Filed in District Court Case number N/A

☒ Does not contain the social security number of any person.

-OR-

☐ Contains the social security number of a person as required by:

A. A specific state or federal law, to wit:

(State specific law)

-or-

B. For the administration of a public program or for an application for a federal or state grant.

Chris Smith
Signature

5/10/22
Date

Chris Smith
Print Name

Petitioner
Title